

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRAD AMOS,)
)
Plaintiff,) Case No. 3:21-cv-00923
)
v.) District Judge Richardson
)
THE LAMPO GROUP, LLC, et al,) Magistrate Judge Holmes
)
Defendants.)

**PLAINTIFF'S RESPONSE TO DEFENDANT
THE LAMPO GROUP'S FIRST SET OF INTERROGATORIES**

Plaintiff, Brad Amos, by and through the undersigned counsel and pursuant to Rule 33 of the Federal Rules of Civil Procedure, submits the following response to Defendant The Lampo Group's ("Lampo") First Set of Interrogatories to Plaintiff.

Interrogatory No. 1. Identify every allegation in the First Amended Complaint (Doc. #21) that is not true and correct.

ANSWER: Plaintiff has alleged, and continues to allege, that each fact provided and each count stated in his Complaint is true and correct.

Interrogatory No. 2. Identify every person and entity who may have discoverable information regarding any of the allegations or claims that Plaintiff has asserted against Lampo by (i) name, (ii) physical address, (iii) mailing address, (iv) telephone number, and (v) e-mail address.

ANSWER: Plaintiff has identified several potential witnesses with discoverable information in his Rule 26 Initial Disclosures. In addition, Plaintiff lists the following current or former

4 S.W.3d694, 703 (Tenn. Ct. App. 1999)(“The amount of damages may be uncertain, however, if the Plaintiff lays a sufficient foundation to allow the trier of fact to make a fair and reasonable assessment of damages.”)

Plaintiff will supplement this response with any expert report they may obtain as well.

Interrogatory No. 13. Identify every application that Plaintiff has submitted for an employment or independent contractor position since January 1, 2019 by providing the following information:

- a. The date that the application was submitted;
- b. The employer or independent contractor to which the application was submitted;
- c. A description of the position applied for;
- d. The location of the position;
- e. Whether Plaintiff was offered the position; and
- f. Whether Plaintiff accepted the position.

ANSWER: Plaintiff has identified his attempts to mitigate his damages in his production, *see Amos (0001-0101)*. Plaintiff was hired for a brief contract in February 2021 for Mark Woollen and associates and was compensated approximately 12,000.00. Plaintiff has received no other income until he was hired by CMP West as a video editor on August 9, 2021. Plaintiff is still employed with CMP West.

Interrogatory No. 14. Identify every source of income for Plaintiff since January 1, 2019, by providing the following information:

- a. The name of the source;
- b. The mailing address, physical address, telephone number, and e-mail address of the source; and

- c. The amount of income that Plaintiff received from the source for each year beginning with 2019.

ANSWER: Plaintiff identifies the following sources of income:

Employer: Mark Woollen and Associates

Position: Contracted Video Editor

Dates Contracted: approximately February 1 – February 21, 2021

Compensation: approximately \$12,000.00

Employer: CMC West

Position: Video Editor

Dates Employed: August 9, 2021- present

Compensation: \$100/hour

Respectfully Submitted,
THE EMPLOYMENT AND CONSUMER LAW GROUP
/s/ JONATHAN A. STREET
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VERIFICATION

I affirm, under penalty of perjury, that my answers to Defendant, The Lampo Group, LLC's, First Set of Interrogatories to Plaintiff are true to the best of my knowledge.

Brad Amos

Sworn to and subscribed before me on the _____ day of _____, 2022.

Notary Public

My Commission Expires:_____

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was sent via email to the following recipients on this the 6th day of May, 2022.

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